

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ILLINOIS UNION INSURANCE COMPANY
as subrogee of CITY OF LAWRENCE

Plaintiff,

v.

THE VIKING CORPORATION

Defendant.

) CIVIL ACTION
) NO.04-10475 MLW
)
)
) JURY TRIAL DEMANDED
)

) MOTION FOR ADMISSION OF
) COUNSEL *PRO HAC VICE*
)

FILING FEE PAID:

RECEIPT #

AMOUNT \$

BY DPTY CLK

DATE

56244
100.00
3/28/04

NOW COMES Patrick J. Loftus, III, Esquire, Counsel for Plaintiff, Illinois Union

Insurance Company as subrogee of City of Lawrence, and respectfully moves this Court to enter an Order, in the form attached, for the admission *pro hac vice* of James P. Cullen, Jr., Esquire, and Kathleen P. Loughhead, Esquire, of the law firm of Cozen O'Connor, to appear herein as counsel for Plaintiff.

In support of this motion, Movant states as follows:


1. I am an attorney duly licensed to practice law in the Commonwealth of Massachusetts, and am attorney for Plaintiff in the above-captioned action.
2. The above-captioned action involves a water discharge incident, with resulting damage sustained by the City of Lawrence.
3. The above-captioned action was commenced in March, 2004.
4. I have been acting as local counsel for Plaintiff with respect to this matter; as local counsel for the Plaintiff, I have cooperated with Mr. Cullen and Ms. Loughhead, who have also prepared the case and are also ready to proceed with discovery and trial.
5. I know Mr. Cullen and Ms. Loughhead to be qualified attorneys with significant experience in the areas of product liability and property damage litigation and other

issues being presented in this lawsuit and to be members in good standing of the Bar of the Commonwealth of Pennsylvania, and are also familiar with the local rules of procedure for this court.

6. In further support of its motion, Movant incorporates, by reference, the annexed Affidavit of James P. Cullen, Jr., Esquire [see Exhibit "A"] and Kathleen P. Loughhead, Esquire [see Exhibit "B"].

WHEREFORE, Movant respectfully requests that the Court grant an order allowing the admission *pro hac vice* of James P. Cullen, Jr., Esquire, and Kathleen P. Loughhead, Esquire, to practice with respect to the above-entitled action.

Plaintiff Illinois Union Insurance Company
as subrogee of City of Lawrence,
By Its Attorney,


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